

EXHIBIT 13

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF NEW JERSEY
3 -----
4) IN RE JOHNSON & JOHNSON)
5) TALCUM POWDER PRODUCTS) MDL NO.
6) MARKETING, SALES PRACTICES,) 16-2738(FLW)(LHG)
7) AND PRODUCTS LIABILITY)
8) LITIGATION)
9) -----

10 IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
11 STATE OF MISSOURI
12) VALERIE SWANN,)
13))
14) Plaintiff,)
15))
16) Cause No.
17) v.) 1422-CC09326-03
18))
19) JOHNSON & JOHNSON, et al.,)
20))
21) Defendants.)
22) -----

23) _____
24) Tuesday, September 14, 2021
25) _____

26 Oral Deposition of JUDITH WOLF, M.D.,
27 VOLUME 2, held at the Fairmont Hotel, 101 Red
28 River Street, Austin, Texas, commencing at
29 8:53 a.m. CDT, on the above date, before
30 Michael E. Miller, Fellow of the Academy of
31 Professional Reporters, Certified Court
32 Reporter, Registered Diplomate Reporter,
33 Certified Realtime Reporter and Notary
34 Public.

35) _____
36) GOLKOW LITIGATION SERVICES
37) 877.370.DEPS | fax 917.591.5672
38) deps@golkow.com

1 Q. In Ms. Judkins' case, as in
2 each of the cases we've discussed, there's
3 the potential for unknown causes of ovarian
4 cancer. But in your view, talcum powder use
5 is a cause of her ovarian cancer, correct?

6 DR. THOMPSON: Object to form.

7 A. In my view, after review of all
8 her medical records and her depositions and
9 her forms, that talcum powder is a cause of
10 her ovarian cancer -- her talcum powder use.

11 BY MR. ZELLERS:

12 Q. All of the questions that I've
13 asked you in the past as to whether you have
14 individual opinions about asbestos or heavy
15 metals or fragrances that may be contained in
16 the talc, your opinion in this case is not as
17 to those specific ingredients, but it's to
18 the ingredients as a whole, the talc, which,
19 in your opinion, in this case caused
20 Ms. Judkins' ovarian cancer, correct?

21 DR. THOMPSON: Object to form,
22 misstates her testimony.

23 A. So it's the talc which contains
24 or had been found to contain asbestos talc
25 fibers, the heavy metals, nickel, chromium,

1 cobalt that we've talked about, and some
2 irritating fragrance ingredients.

3 BY MR. ZELLERS:

4 Q. Once again, we have no evidence
5 in Ms. Judkins' case of any samples of the
6 talcum powder she used that you're aware of;
7 is that right?

8 A. I'm not aware that we have any
9 of the samples of her baby powder that she
10 used.

11 Q. You have not communicated or
12 talked with Ms. Judkins; is that right?

13 A. I actually was on a phone call
14 with Ms. Judkins one time.

15 Q. When was that?

16 A. About a year and a half ago.
17 It was sometime deep in the pandemic, so...

18 Q. And for how long did the phone
19 call last?

20 A. It was with attorneys. I don't
21 remember how long the phone call was. Maybe
22 30, 40 minutes.

23 Q. And what was the purpose of the
24 phone call?

25 DR. THOMPSON: And I think that